Scott L. Black
Senior Trial Counsel
Attorney for Plaintiff
SECURITIES AND EXCHANGE COMMISSION
New York Regional Office
3 World Financial Center, Room 4300
New York, New York 10281
(212) 336-0029

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

05 Civ. 6991 (KMW)

Plaintiff,

:

-against-

SONJA ANTICEVIC, DAVID PAJCIN, EUGENE
PLOTKIN, STANISLAV SHPIGELMAN,
NICKOLAUS SHUSTER, JUAN C. RENTERIA, JR.,
HENRY SIEGEL, ELVIS SANTANA, MONIKA
VUJOVIC, MIKHAIL PLOTKIN, PERICA
LOPANDIC, BRUNO VERINAC, ZORAN SORMAZ,
ILIJA BORAC, ANTUN DILBER, ANTO KRSIC,
and JASON C. SMITH,

:

Defendants.

ienaants.

NOTICE OF MOTION FOR A DEFAULT JUDGMENT AGAINST SONJA ANTICEVIC PURSUANT TO RULE 55(b) OR, IN THE ALTERNATIVE, 37(d) OF THE FEDERAL RULES OF CIVIL PROCEDURE

PLEASE TAKE NOTICE, that plaintiff, the Securities and Exchange Commission (the "Commission"), respectfully moves for a default judgment against Sonja Anticevic pursuant to Rule 55(b), or, in the alternative, 37(d) of the Federal Rules of Civil Procedure ("FRCP"). The Commission's motion pursuant to FRCP 55(b) is premised upon Anticevic's failure to answer the Fourth Amended Complaint. The Commission's motion pursuant to FRCP 37(d) is premised upon Anticevic's failure to appear at her deposition, which the Commission had duly noticied for

January 5, 2009. As part of such default judgment, the Commission also seeks the entry of an order directing Anticevic to pay disgorgement, prejudgment interest and penalties. In the event the Court denies the Commission's application for a default judgment, the Commission seeks an order sanctioning Anticevic pursuant to any of the other provisions set forth in FRCP 37(b)(2)(A) it deems appropriate for failure to appear at her deposition. In support of this motion, the Commission submits: (1) the Declaration of Scott L. Black in Support of Motion for a Default Judgment Against Sonja Anticevic Pursuant to Rule 55(b) or, in the Alternative, 37(d) of the Federal Rules of Civil Procedure and the Exhibits thereto; (2) the Declaration of Melissa Coppola and the Exhibits thereto; and (3) Plaintiff's Memorandum of Law in Support of Motion

for a Default Judgment Against Sonja Anticevic Pursuant to Rule 55(b) or, in the Alternative,

Dated: New York, New York March 30, 2009

s/

37(d) of the Federal Rules of Civil Procedure.

Scott L. Black Securities and Exchange Commission 3 World Financial Center New York, New York 10281 (212) 336-0029 blacks@sec.gov